

1 AMERICAN CIVIL LIBERTIES UNION
2 FOUNDATION OF NORTHERN CALIFORNIA
3 WILLIAM S. FREEMAN (SBN 82002)
4 SEAN RIORDAN (SBN 255752)
5 39 Drumm Street
San Francisco, CA 94111
Telephone: (415) 621-2493
Facsimile: (415) 255-8437
Email: wfreeman@aclunc.org
sriordan@aclunc.org

ACLU FOUNDATION
IMMIGRANTS' RIGHTS PROJECT
STEPHEN B. KANG (SBN 292280)
39 Drumm Street
San Francisco, CA 94111
Telephone: (415) 343-0770
Facsimile: (212) 395-0950
E-mail: skang@aclu.org

NEW YORK CIVIL LIBERTIES UNION
FOUNDATION
CHRISTOPHER DUNN
AMY BELSHER
JESSICA PERRY
125 Broad Street, 19th Floor
New York, NY 10004
Telephone: (212) 607-3300
Facsimile: (212) 607-3318
Email: dcunn@nyclu.org
abelser@nyclu.org
jperry@nyclu.org

COOLEY LLP
MARTIN S. SCHENKER (SBN 109828)
ASHLEY K. CORKERY (SBN 301380)
EVAN G. SLOVAK (SBN 319409)
101 California Street, 5th Floor
San Francisco, CA 94111
Telephone: (415) 693-2000
Facsimile: (415) 693-2222
Email: mschenker@cooley.com
acorkery@cooley.com
eslovak@cooley.com

LAW OFFICES OF HOLLY S. COOPER
HOLLY S. COOPER (SBN 197626)
P.O. Box 4358
Davis, CA 95617
Telephone: (530) 574-8200
Facsimile: (530) 752-0822
Email: hscooper@ucdavis.edu

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

21 Ilsa Saravia, as next friend for A.H., a
22 minor, and on behalf of herself individually
and others similarly situated,

Case No. 3:17-cv-03615-VC

Honorable Vince Chhabria

**[PROPOSED] ORDER SHORTENING
BRIEFING SCHEDULE AND SETTING
MOTION HEARING ON PLAINTIFF'S
MOTION FOR PRELIMINARY APPROVAL
OF CLASS SETTLEMENT**

Plaintiff,

V.

25 || William Barr, Attorney General, et al

Defendants.

1 WHEREAS, the Parties have reached a settlement in the above-captioned action;

2 WHEREAS, Plaintiff intends to file a Motion for Preliminary Approval of Class Settlement no
3 later than September 18, 2020;

4 WHEREAS, Defendants do not intend to oppose the Plaintiff's Motion for Preliminary
5 Approval;

6 WHEREAS, the parties agree that it would be most efficient to shorten the standard 35-day
7 briefing schedule per L-R 7-2 and for the Court to hold a preliminary approval hearing on
8 October 15, 2020;

9 WHEREAS, counsel for Plaintiff has an existing obligation scheduled for October 22, 2020,

10 NOW, THEREFORE, the parties respectfully request that the Court set the briefing schedule
11 and hearing date as follows:

12 • September 18, 2020: Plaintiff to file Motion for Preliminary Approval of Class Settlement;
13 • September 25, 2020: Defendants to file Notice of Non-Opposition;
14 • October 15, 2020 (or as early as the Court allows): Preliminary Approval on Plaintiff's
15 Motion.

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1 Dated: September 17, 2020

COOLEY LLP

2 /s/ Martin S. Schenker

3 Martin S. Schenker
Ashley S. Corkery
Evan G. Slovak

5 American Civil Liberties Union Foundation of
Northern California
6 William S. Freeman
Sean Riordan

7 ACLU Foundation Immigrants' Rights Project
8 Stephen B. Kang

9 Law Offices of Holly S. Cooper
Holly Cooper

10 New York Civil Liberties Union Foundation
Christopher Dunn
11 Amy Belsher
12 Jessica Perry

13 *Attorneys for Plaintiff*

14

15 Dated: September 17, 2020

UNITED STATES DEPARTMENT OF JUSTICE

16 /s/ Nicole M. Murley

17 Nicole M. Murley
Sarah B. Fabian

18 *Attorneys for Defendants*

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ATTESTATION

I hereby attest that concurrence in the filing of this document has been obtained from the Signatory of this document, pursuant to L.R. 5-1(i)(3).

/s/ Martin S. Schenker

Martin S. Schenker

ORDER

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.
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3 Dated: _____
4 Hon. Vince Chhabria
United States District Judge
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